

# **EXHIBIT B**

**LABATON KELLER SUCHAROW**  
Thomas A. Dubbs (*pro hac vice*)  
Michael P. Carty (*pro hac vice*)  
Thomas G. Hoffman, Jr. (*pro hac vice*)  
140 Broadway  
New York, New York 10005

**LOWENSTEIN SANDLER LLP**  
Michael S. Etkin (*pro hac vice*)  
Andrew Behlmann (*pro hac vice*)  
Scott Cargill (*pro hac vice*)  
One Lowenstein Drive  
Roseland, New Jersey 07068

*Lead Counsel to Securities Lead Plaintiff and  
the Class*

*Special Bankruptcy Counsel to Securities  
Lead Plaintiff and the Class*

**MICHELSON LAW GROUP**  
Randy Michelson (SBN 114095)  
220 Montgomery Street, Suite 2100  
San Francisco, California 94104

## *Local Bankruptcy Counsel to Securities Lead Plaintiff and the Class*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

- and -  
PACIFIC GAS AND ELECTRIC  
COMPANY,

**DECLARATION OF GREG TRUJILLO  
IN SUPPORT OF MOTION FOR CLASS  
CERTIFICATION**

## Debtors.

- Affects Both Debtors
  - Affects PG&E Corporation
  - Affects Pacific Gas and Electric Company

1 I, Greg Trujillo, declare as follows:

2 1. I respectfully submit this declaration on behalf of the Public Employees Retirement  
3 Association of New Mexico (“PERA”), in support of its motion for class certification (the  
4 “Motion”). I am the Executive Director for PERA. Further, I have personal knowledge of the  
5 statements herein and, if called upon as a witness, could and would competently testify thereto.  
6 PERA seeks appointment as a Class Representative in this action, and I am duly authorized by  
7 PERA to take all necessary steps to seek this appointment.<sup>1</sup>

8 2. PERA provides pension benefits for state and local public employees in New  
9 Mexico.

10 3. PERA’s transactions in PG&E Corp. Class A common stock during the period from  
11 April 29, 2015 through November 15, 2018 (the “Class Period”) are reflected in Exhibit A,  
12 attached hereto.

13 4. PERA’s transactions in Pacific Gas & Electric Co. bonds during the Class Period  
14 are reflected in Exhibit B, attached hereto.

15 5. PERA did not purchase or acquire securities of PG&E at the direction of counsel  
16 or in order to participate in any private action under the federal securities laws.

17 6. On behalf of PERA, I, along with my colleagues, agree to monitor the progress of  
18 this litigation. I, along with my colleagues, conferred and will continue to confer with Court-  
19 appointed lead counsel Labaton Keller Sucharow LLP (“LKS”). For example, we have and will  
20 continue to receive and review court filings, including, but not limited to, the Third Amended  
21 Consolidated Class Action Complaint (District Court ECF No. 121) and legal briefs. I, along with  
22 my colleagues, have and will continue to regularly confer with LKS regarding periodic litigation  
23 updates.

24 7. PERA will be actively involved in the discovery process in this litigation, including,  
25 but not limited to, the document collection process. PERA could and would participate in a  
26 deposition at the appropriate time.

27 \_\_\_\_\_  
28 <sup>1</sup> Capitalized terms herein have the same meaning as in the Motion.

1           8. PERA is committed to actively directing this litigation to maximize the recovery of  
2 the Class. As Court-appointed Lead Plaintiff, PERA understands the fiduciary duties it owes to all  
3 members of the proposed Class to provide fair and adequate representation. PERA will continue  
4 to work with LKS to maximize recovery for the proposed Class.

5       9. PERA will continue to direct this litigation by, including but not limited to,  
6 attending hearings, depositions, and/or trial, and overseeing the preparation and filing of pleadings,  
7 as necessary.

8        10. PERA seeks appointment of LKS as Class Counsel based on its substantial  
9 experience and expertise in prosecuting securities class actions. PERA believes that LKS possesses  
10 the necessary skills, resources, and ability to prosecute this case vigorously and effectively on  
11 behalf of the proposed Class.

12        11. Beyond its pro rata share of any recovery, PERA will not accept payment for  
13 serving as a Class Representative, except the reimbursement of such reasonable costs and expenses  
14 (including lost wages) directly relating to the representation of the proposed Class as ordered or  
15 approved by the Court.

16 I declare under penalty of perjury, under the laws of the United States, that the foregoing  
17 is true and correct.

18 | Executed this 23<sup>rd</sup> day of December 2024, in Taos, New Mexico.

*[Signature]*

Greg Trujillo

## EXHIBIT A

<b>PG&amp;E CORP. Common Stock</b>				
<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>	
<b>PCG</b>	<b>69331C108</b>	<b>2689560</b>	<b>US69331C1080</b>	
<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>	<b>Cost / Proceeds</b>
Purchase	06/03/15	1,000.00	\$51.97	(\$51,970.00)
Purchase	06/03/15	2,000.00	\$51.97	(\$103,940.00)
Purchase	07/13/15	2,500.00	\$51.15	(\$127,872.75)
Purchase	03/10/16	1,100.00	\$56.95	(\$62,645.99)
Purchase	06/24/16	3,200.00	\$62.66	(\$200,512.00)
Purchase	08/09/16	94,400.00	\$63.60	(\$6,004,113.76)
Sale	08/25/16	-54.00	\$63.56	\$3,432.41
Sale	08/25/16	-1,691.00	\$63.58	\$107,512.43
Purchase	08/25/16	11,768.00	\$63.66	(\$749,143.82)
Sale	08/26/16	-1,315.00	\$62.99	\$82,826.06
Sale	08/26/16	-1,503.00	\$63.08	\$94,803.98
Sale	08/29/16	-376.00	\$62.50	\$23,500.00
Sale	08/29/16	-1,865.00	\$62.55	\$116,646.98
Sale	08/30/16	-1,878.00	\$62.04	\$116,508.87
Sale	08/31/16	-126.00	\$61.80	\$7,786.99
Purchase	08/31/16	74,700.00	\$61.94	(\$4,627,052.46)
Purchase	09/27/16	6,153.00	\$63.80	(\$392,539.25)
Purchase	10/20/16	8,307.00	\$60.96	(\$506,386.41)
Purchase	11/08/16	700.00	\$62.02	(\$43,414.00)
Sale	11/17/16	-8,258.00	\$58.72	\$484,925.45
Sale	11/17/16	-227.00	\$58.96	\$13,383.38
Sale	11/17/16	-7,285.00	\$59.03	\$430,058.32
Sale	11/18/16	-4,630.00	\$58.40	\$270,409.59
Purchase	11/22/16	6,224.00	\$59.28	(\$368,962.45)
Sale	11/29/16	-4,519.00	\$60.69	\$274,260.37
Sale	11/30/16	-2,288.00	\$59.21	\$135,469.51
Sale	12/01/16	-1,197.00	\$57.90	\$69,308.57
Sale	12/02/16	-796.00	\$58.32	\$46,424.55
Purchase	12/13/16	7,217.00	\$60.40	(\$435,937.11)
Sale	01/06/17	-3,108.00	\$60.84	\$189,090.72
Sale	01/06/17	-8,392.00	\$60.97	\$511,683.74
Purchase	01/20/17	10,349.00	\$61.41	(\$635,532.09)
Purchase	02/13/17	400.00	\$63.69	(\$25,476.00)
Purchase	02/24/17	7,378.00	\$65.95	(\$486,588.69)
Sale	03/08/17	-4,763.00	\$65.24	\$310,739.07
Sale	03/09/17	-1,809.00	\$65.29	\$118,105.63
Sale	03/10/17	-928.00	\$65.35	\$60,648.33
Purchase	03/22/17	1,010.00	\$67.57	(\$68,241.56)
Sale	04/07/17	-8,900.00	\$67.11	\$597,294.13
Purchase	04/10/17	50,200.00	\$66.93	(\$3,359,735.40)
Purchase	05/25/17	5,600.00	\$66.80	(\$374,085.04)
Sale	05/31/17	-427.00	\$68.38	\$29,198.26
Sale	05/31/17	-1,710.00	\$68.38	\$116,929.80
Purchase	06/06/17	2,323.00	\$68.74	(\$159,680.93)
Purchase	06/30/17	11,240.00	\$66.61	(\$748,694.15)
Purchase	07/24/17	1,168.00	\$67.90	(\$79,307.20)

EXHIBIT A

Case No. 5:18-cv-03509-EJD

Case: 19-30088 Doc# 14675-2 Filed: 12/23/24 Entered: 12/23/24 16:35:27 Page 5 of 8 - 1 -

PG&E CORP. Common Stock				
Ticker	CUSIP	SEDOL	ISIN	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Purchase	08/31/17	1,700.00	\$70.30	(\$119,510.51)
Sale	10/10/17	-8,637.00	\$69.16	\$597,294.33
Sale	10/11/17	-977.00	\$69.08	\$67,494.38
Sale	10/11/17	-4,936.00	\$69.30	\$342,064.80
Purchase	10/30/17	4,180.00	\$57.23	(\$239,222.65)
Sale	11/20/17	-2,900.00	\$52.65	\$152,685.00
Sale	11/30/17	-13,862.00	\$54.24	\$751,874.88
Sale	11/30/17	-41,586.00	\$54.24	\$2,255,624.64
Sale	11/30/17	-7,887.00	\$54.25	\$427,869.75
Sale	12/01/17	-15,727.00	\$54.28	\$853,636.40
Sale	12/04/17	-9,743.00	\$54.13	\$527,404.18
Sale	12/05/17	-12,339.00	\$53.54	\$660,590.58
Sale	12/06/17	-2,135.00	\$53.53	\$114,282.07
Sale	12/07/17	-4.00	\$53.01	\$212.03
Sale	12/08/17	-665.00	\$53.19	\$35,369.69
Sale	12/15/17	-5,000.00	\$53.05	\$265,250.00
Sale	01/31/18	-2,040.00	\$41.79	\$85,260.37
Sale	02/21/18	-500.00	\$39.79	\$19,895.00
Purchase	04/16/18	5,859.00	\$45.08	(\$264,123.72)
Purchase	04/16/18	94.00	\$45.30	(\$4,257.97)
Purchase	04/16/18	40,480.00	\$45.50	(\$1,842,026.21)
Purchase	04/17/18	3,307.00	\$45.91	(\$151,838.92)
Sale	05/31/18	-24,012.00	\$43.33	\$1,040,439.96
Purchase	06/25/18	1,100.00	\$42.10	(\$46,307.03)
Sale	06/20/18	-22,400.00	\$40.00	\$896,000.00
Sale	06/20/18	-1,600.00	\$40.00	\$64,000.00
Purchase	08/20/18	1,700.00	\$44.80	(\$76,163.23)
Sale	08/21/18	-42,400.00	\$44.83	\$1,900,817.44
Purchase	10/11/18	5,228.00	\$46.93	(\$245,358.93)
Purchase	10/11/18	14,772.00	\$47.09	(\$695,682.91)
Sale	10/22/18	-17,750.00	\$47.87	\$849,747.53
Sale	10/23/18	-17,750.00	\$47.47	\$842,539.25

## **EXHIBIT B**

PACIFIC GAS & ELECTRIC CO. 5.625% 11/30/2017 DD 12/04/07				
Ticker	CUSIP	SEDOL	ISIN	
	694308GL5	B29T8Z2	US694308GL57	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Maturity	11/30/17	-750,000.00	\$100.00	\$750,000.00

  

PACIFIC GAS & ELECTRIC CO. 8.250% 10/15/2018 DD 10/21/08				
Ticker	CUSIP	SEDOL	ISIN	
	694308GN1	BG191B2	US694308GN14	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Corporate Actions	12/29/17	-500,000.00	\$104.71	\$523,568.99
Corporate Actions	02/20/18	-500,000.00	\$103.79	\$518,935.16

  

PACIFIC GAS & ELECTRIC CO. 3.750% 08/15/2042 DD 08/16/12				
Ticker	CUSIP	SEDOL	ISIN	
	694308HA8	B7MTCC9	US694308HA83	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Sales	03/31/17	-250,000.00	\$94.87	\$237,182.50

  

PACIFIC GAS & ELECTRIC CO. 6.050% 03/01/2034 DD 03/23/04				
Ticker	CUSIP	SEDOL	ISIN	
	694308GE1	B8FPMT8	US694308GE15	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Purchase	05/11/16	850,000.00	\$132.53	(\$1,126,471.00)

  

PACIFIC GAS & ELECTRIC CO. 4.250% 08/01/2023 DD 08/06/18				
Ticker	CUSIP	SEDOL	ISIN	
	694308HZ3	BDG28N9	US694308HZ35	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Purchase	08/02/18	1,405,000.00	\$99.77	(\$1,401,698.25)
Sale	11/15/18	-220,000.00	\$89.00	\$195,800.00

  

PACIFIC GAS & ELECTRIC CO 4.600% 06/15/2043 DD 06/14/13				
Ticker	CUSIP	SEDOL	ISIN	
	694308HD2	BBK3XJ5	US694308HD23	
Transaction Type	Trade Date	Shares / Par Value	Price Per Share / Par Value	Cost / Proceeds
Purchase	06/03/15	125,000	\$101.50	(\$126,875.00)
Sale	08/14/15	-875,000.00	\$103.58	\$906,298.75

1	<b>PACIFIC GAS &amp; ELECTRIC CO. 3.300% 03/15/2027 DD 03/10/17</b>			
2	<b>Ticker</b>	<b>CUSIP</b>	<b>SEDOL</b>	<b>ISIN</b>
3		<b>694308HS9</b>	<b>BYXYH72</b>	<b>US694308HS91</b>
4	<b>Transaction Type</b>	<b>Trade Date</b>	<b>Shares / Par Value</b>	<b>Price Per Share / Par Value</b>
5	Purchases	03/07/17	95,000.00	\$99.65
6				(\$94,662.75)
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				

EXHIBIT B

CASE NO. 5:18-CV-03509-EJD